

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:
GENERAL MOTORS LLC IGNITION SWITCH LITIGATION

14-MD-2543 (JMF)
14-MC-2543 (JMF)

**APPLICATION OF NORMAN A. YATOOMA FOR THE POSITIONS OF
STATE/FEDERAL LIAISON COUNSEL OR EXECUTIVE COMMITTED MEMBER**

This application is submitted to the Court, pursuant to the Court's July 18, 2014 *Order No. 5* to aid in the Court's consideration during the appointment process. The undersigned, Norman A. Yatooma (Yatooma), hereby submits this application for the positions of 1. State/Federal Liaison Counsel; and 2. Executive Committee Member. In line with the Court's appointment criteria set for the in Order No. 5, Yatooma states as follows:

(1) Knowledge and experience in prosecuting complex litigation, including MDL's and class actions.

Yatooma has substantial knowledge and experience in prosecuting complex litigation, including MDL's and class actions.

MDL Experience

Yatooma has litigated complex commercial claims in 38 states, representing hundreds of franchisees against some of the world's largest franchisors, including by example only, Exxon Mobil, Burger King, The Athlete's Foot, Ziebart International, and the Thomas Kinkade Company. To this end, Yatooma has achieved results on behalf of such franchisees in multiple jurisdictions that are entirely unparalleled by any law firm which brought related cases.

Class Action Experience – Plaintiff

In addition to the many large MDL franchise matters, Yatooma has worked on behalf of multiple class action plaintiffs in several other matters, including Microsoft and Smuckers by example.

Class Action Experience – Defendant

Yatooma has successfully defended multiple class action cases and is currently defending a class action in the Eastern District of Michigan's Federal Court.

(2) Willingness and ability to commit to a time-consuming process

Yatooma is willing and able to commit whatever time and resources are necessary to fulfill his duties if appointed State/Federal Liaison Counsel or as a Member of the

Executive Committee. Yatooma is no stranger to investing thousands of hours in a case, as has been done in all of the above referenced MDL matters.

(3) Willingness and ability to work cooperatively with others.

Yatooma commonly works with Co-Counsel across the street and across the country. Yatooma has significant experience in working with multiple counsel in matters such as these, and has already expressed such a willingness to Plaintiff's Lead Counsel.

(4) Access to resources to prosecute the litigation in a timely manner.

Yatooma serves as the Principal of Norman Yatooma & Associates, P.C. His attorneys are quite familiar with the demands of complex litigation. Yatooma knows the resources that are necessary to prosecute this matter and will ensure the swift and orderly administration of his role.

(5) The work counsel has done in identifying, investigating, or prosecuting potential claims in the action.

Yatooma is co-counsel with Kassem Dakhallallah. They have identified and interviewed approximately 30 potential plaintiffs in this matter, in addition to having filed one of the first lawsuits in this case.

(6) Counsel's knowledge of applicable law.

Yatooma has resolved numerous matters involving consumer products and liability in both state and federal court, both in Michigan and in multiple jurisdictions throughout the country.

(7) Geographic Diversity.

General Motors World Headquarters and Technical Center are located in Detroit and Warren, Michigan. Arguably all of the relevant documents, witnesses, testing facilities, suppliers and local legal counsel will be situated in Yatooma's immediate geographical area. Yatooma's resources and proximity will be of significant benefit during the discovery stage of this matter.

Yatooma is also experienced at working with the Detroit media, most interested in covering this case. In fact, Yatooma is handling what is arguably metro-Detroit's most high-profile litigation, currently on appeal to the United States Supreme Court.

CONCLUSION

Yatooma, for all of the aforementioned reasons, respectfully requests that his Honorable Court appoints Yatooma to a position on the Executive Committee and further respectfully requests an appointment as State/Federal Liaison Counsel.

Respectfully Submitted,

/s/ Norman A. Yatooma

Norman A. Yatooma

Co-counsel for Plaintiff Adnan Jawad

1615 South Telegraph Road, Suite 200

Bloomfield Hills, Michigan 48302

Tel: (248) 481-2000

Fax: (248) 481-2070

nyatooma@normanyatooma.com

Dated: July 25, 2014